

Message

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**From:** Lischinsky, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5AA1867DF1D64FE09BF558533C62FF82-RLISCHIN]  
**Sent:** 5/20/2019 4:32:15 PM  
**To:** Lischinsky, Robert [Lischinsky.Robert@epa.gov]  
**Subject:** FW: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review  
**Attachments:** Updates to Referencing the 2018 Wehrum Reclassification Memo; Referencing the 2018 MM2A Memorandum in MACT Applicability Determinations - Word Version.docx

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**From:** Lischinsky, Robert  
**Sent:** Tuesday, January 29, 2019 4:40 PM  
**To:** Shiffman, Cari <Shiffman.Cari@epa.gov>; Branning, Hannah <Branning.Hannah@epa.gov>  
**Cc:** Ayres, Sara <Ayres.Sara@epa.gov>; Segall, Martha <Segall.Martha@epa.gov>; Duffy, Rick <Duffy.Rick@epa.gov>  
**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Hi Cari,

We had only worked with OAQPS in the initial drafting. As you know, Patrick significantly revised and it was our understanding from your attached 11/7 e-mail that he worked with both OAR and OGC when making his revisions.

Also attached is the final Word version of the memo. Regarding transmittal to the RAs, it would be appropriate to state that in the interest of ensuring national consistency, OECA and OAR are jointly issuing this memo to provide guidance to the regional offices regarding how to appropriately reference the 2018 MM2A Memo (Wehrum Reclassification Memo) when responding to requests for a Clean Air Act applicability determination (AD).

My regional contacts are the Regional Air Enforcement Managers (AEMs) who are as follows:

R1: Steve Rapp  
R2: Robert Buettner  
R3: Zelma Maldonado  
R4: Beverly Spagg  
R5: Sarah Breneman  
R6: Steve Thompson  
R7: Leslye Werner  
R8: Scott Patefield  
R9: Matt Salazar  
R10: Katie McClintock

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**From:** Shiffman, Cari  
**Sent:** Tuesday, January 29, 2019 4:03 PM  
**To:** Lischinsky, Robert <Lischinsky.Robert@epa.gov>; Branning, Hannah <Branning.Hannah@epa.gov>  
**Cc:** Ayres, Sara <Ayres.Sara@epa.gov>; Segall, Martha <Segall.Martha@epa.gov>; Duffy, Rick <Duffy.Rick@epa.gov>  
**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Rob and Sara,

Also, I can't remember if we already discussed this, but was whoever you have been working with in OGC comfortable with this version. I think I recall you saying yes, but just wanted to double check.

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: (202) 823-3277

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**From:** Shiffman, Cari  
**Sent:** Tuesday, January 29, 2019 3:33 PM  
**To:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>  
**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>  
**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Rob,

Susan and Bill are signing today. We need to make a change to the OAR contact on the last page, but at this point I am not sure if I have the final word version.

Also, anything specific you want Susan to include in her transmittal to the RAs? Also, I need the e-mail list of the Regional Air Enforcement Directors and anyone else it needs to go to that are not on the ccs.

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: (202) 823-3277

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**From:** Lischinsky, Robert  
**Sent:** Friday, December 21, 2018 10:28 AM  
**To:** Shiffman, Cari <[Shiffman.Cari@epa.gov](mailto:Shiffman.Cari@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>  
**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>  
**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Yes, he has seen the final version as indicated in the attached e-mail chain (Josh Lewis' 12/4 e-mail)

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**From:** Shiffman, Cari  
**Sent:** Friday, December 21, 2018 10:14 AM  
**To:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>  
**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA  
Signature Version for review

Do you know if Bill has seen it yet?

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: (202) 823-3277

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**From:** Lischinsky, Robert  
**Sent:** Friday, December 21, 2018 9:57 AM  
**To:** Shiffman, Cari <[Shiffman.Cari@epa.gov](mailto:Shiffman.Cari@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>  
**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>  
**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA  
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I do not think there is any urgency on OECA's part but Debra Dalcher of OAR, on Tuesday, had asked about status and whether the "package has moved to Bill Wehrum yet." So, OAR may be looking to get it out sooner rather than later.

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**From:** Shiffman, Cari  
**Sent:** Friday, December 21, 2018 9:50 AM  
**To:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>  
**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>  
**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA  
Signature Version for review

Rob,

Is there any urgency getting this out today or could it wait until the new year?

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: (202) 823-3277

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**From:** Lischinsky, Robert  
**Sent:** Friday, December 21, 2018 9:45 AM  
**To:** Shiffman, Cari <[Shiffman.Cari@epa.gov](mailto:Shiffman.Cari@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>  
**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Cari,

Thanks for letting us know. Sorry for any confusion regarding where the memo has been in the management chain.

The only change was to remove the OAR "cc" since they do not include and asked us to remove.

Rob

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**From:** Shiffman, Cari

**Sent:** Friday, December 21, 2018 9:39 AM

**To:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>

**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

This is now in the IO. Did you make any changes since the version I sent you?

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: (202) 823-3277

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**From:** Shiffman, Cari

**Sent:** Tuesday, December 18, 2018 11:38 AM

**To:** Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>

**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Rob,

Who did they bring it to in the IO? We haven't seen it.

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Office: (202) 564-2898 | Mobile: (202) 823-3277

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**From:** Lischinsky, Robert

**Sent:** Tuesday, December 18, 2018 9:56 AM

**To:** Shiffman, Cari <[Shiffman.Cari@epa.gov](mailto:Shiffman.Cari@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>; Branning, Hannah <[Branning.Hannah@epa.gov](mailto:Branning.Hannah@epa.gov)>

**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>

**Subject:** FW: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Hi all,

OC/MAMPD brought the referenced final package/guidance memo down for Susan's signature at the end of last week. OAR is already asking for status and when it will be sent over for Bill's signature. Do you have any update we can share with them?

Thanks.

Rob

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**From:** Segall, Martha

**Sent:** Tuesday, December 11, 2018 3:21 PM

**To:** Shiffman, Cari <[Shiffman.Cari@epa.gov](mailto:Shiffman.Cari@epa.gov)>; Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>

**Cc:** Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>; Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Yes, I believe we had gotten the original package back a while ago.

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Martha Segall  
Director (Acting)  
Monitoring, Assistance, and Media Programs Division  
Office of Compliance/OECA  
U.S. EPA  
ph: (202) 564-0723

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**From:** Shiffman, Cari

**Sent:** Tuesday, December 11, 2018 3:09 PM

**To:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>

**Cc:** Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>; Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Sara,

Did you take the original package back?

Thanks,

Cari Shiffman, Chief of Staff  
U.S. Environmental Protection Agency  
Office of Enforcement and Compliance Assurance

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**From:** Ayres, Sara

**Sent:** Tuesday, December 11, 2018 2:59 PM

**To:** Shiffman, Cari <[Shiffman.Cari@epa.gov](mailto:Shiffman.Cari@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>

**Cc:** Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>; Lischinsky, Robert <[Lischinsky.Robert@epa.gov](mailto:Lischinsky.Robert@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Cari and Ethel,

I hadn't heard back on my message below from last week, but just wanted to let you know the final memo package should be coming your way for Susan's signature soon. Let me know if you need anything else. Thanks.

Sara Ayres

Air Branch

USEPA / OECA / OC / MAMPD

[ayres.sara@epa.gov](mailto:ayres.sara@epa.gov)

(312) 353-6266

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**From:** Ayres, Sara

**Sent:** Tuesday, December 4, 2018 12:39 PM

**To:** Shiffman, Cari <[Shiffman.Cari@epa.gov](mailto:Shiffman.Cari@epa.gov)>; Bailey, Ethel <[Bailey.Ethel@epa.gov](mailto:Bailey.Ethel@epa.gov)>

**Cc:** Segall, Martha (<[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>) <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Duffy, Rick (<[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>) <[Duffy.Rick@epa.gov](mailto:Duffy.Rick@epa.gov)>; Lischinsky, Robert <[lischinsky.robert@epa.gov](mailto:lischinsky.robert@epa.gov)>; Mia, Marcia <[mia.marcia@epa.gov](mailto:mia.marcia@epa.gov)>

**Subject:** FW: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Cari,

As you may recall, OAQPS wanted one more chance to review the final signature version of the MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs. I provided the latest version you provided to us on 11/14/18 to OAQPS' front office for review on 11/19/18 (attached). The only change I made (at OAQPS' request) was to remove the OAR cc that you had added as they don't normally cc anyone in their office when they are signing a memo.

I've forwarded the message below noting that they have now completed their review without requesting any further changes and are ready for us to resume the process of preparing the document for Susan's signature. I can have our office put the letter into a signature package, if that's the next step. Let me know what you need. Thanks.

Sara Ayres

Air Branch

USEPA / OECA / OC / MAMPD

[ayres.sara@epa.gov](mailto:ayres.sara@epa.gov)

(312) 353-6266

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**From:** Lewis, Josh

**Sent:** Tuesday, December 4, 2018 7:56 AM

**To:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>; Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>

**Cc:** Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>

**Subject:** RE: MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Sara,

Bill W. is good with this. I think the plan was for Susan to sign first and then the package would come to Bill for his signature?

Josh Lewis  
Chief of Staff  
EPA/Office of Air and Radiation  
Office: 202 564 2095

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**From:** Ayres, Sara

**Sent:** Monday, November 19, 2018 7:32 AM

**To:** Lewis, Josh <[Lewis.Josh@epa.gov](mailto:Lewis.Josh@epa.gov)>; Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>

**Cc:** Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>

**Subject:** MM2A Guidance for Referencing the 2018 Wehrum Reclassification Memorandum in MACT ADs - OECA Signature Version for review

Per Bill Lamason's request, here is the version of the guidance document OECA has prepared for Susan Bodine's signature. Please let me know if you have questions or need additional information. Thanks.

Sara Ayres  
Air Branch  
USEPA / OECA / OC / MAMPD  
[ayres.sara@epa.gov](mailto:ayres.sara@epa.gov)  
(312) 353-6266